

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONALD BERDEAUX and CHRISTINE
GRABLI, Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

ONECOIN LTD.; RUJA IGNATOVA,
SEBASTIAN GREENWOOD; MARK SCOTT;
DAVID PIKE; NICOLE J. HUESMANN;
GILBERT ARMENTA; AND THE BANK OF
NEW YORK MELLON CORPORATION

Defendants.

Case No.: 1:19-cv-04074 (VEC)

**NOTICE OF MOTION
TO DISMISS THE SECOND
AMENDED COMPLAINT
PURSUANT TO FED. R. CIV. PROC.
12 (B) (2) and 12(B)(6)**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of Motion to Dismiss, the undersigned will move this Court, before the Honorable Valarie Caproni, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square New York, NY 10007, at a date and time to be determined by the Court, for an order dismissing the Plaintiffs' Second Amended Complaint in this action, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure and for such further and other relief as the Court may deem just and proper.

Respectfully submitted,

RASKIN & RASKIN, P.A.
201 Alhambra Circle
Suite 1050
Coral Gables, Fl. 33134
Telephone: (305) 444-3400

/s/ Martin R. Raskin
Martin R. Raskin, Esq.
Florida Bar No. 315206

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 21, 2020, I electronically filed the foregoing document with the Clerk of Court using CM/ECF.

/s/ Martin R. Raskin
MARTIN R. RASKIN